

EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP

ATTORNEYS AT LAW  
ONE ROCKEFELLER PLAZA  
8<sup>TH</sup> FLOOR  
NEW YORK, NEW YORK 10020

TEL: (212) 763-5000  
FAX: (212) 763-5001  
www.ecbawm.com

May 16, 2025

*Via ECF; Courtesy Copy Via Email*

Hon. Naomi Reice Buchwald  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., New York, NY 10007-1312

*Re: Chung v. Trump et al., No. 25-cv-2412 (NRB)*

Dear Judge Buchwald:

Together with co-counsel, this firm represents Plaintiff-Petitioner Yunseo Chung in the above-captioned matter. We write in furtherance of our April 10, 2025 request to conduct expedited discovery, which Defendants-Respondents opposed on April 14, 2025, and which is ripe for the Court's decision. *See* ECF Nos. 30, 36.

Since the request's filing, the government has produced two of the documents at issue, specifically the Secretary of State Marco Rubio's March 2025 letter to the Department of Homeland Security identifying Ms. Chung as one of two lawful permanent residents to be deported, as well as an administrative arrest warrant for Ms. Chung. *See* ECF No. 34 at 7-8, 10. The undersigned have conferred by email with Defendants-Respondents to ask whether their position on producing the balance of the documents requested remains the same, and Defendants-Respondents confirmed yesterday that they continue to object.

In light of these developments, Ms. Chung respectfully renews her request for the limited discovery set forth in her letter-motion dated April 10, 2025.

Thank you for your consideration of this request.

Given the Government's pending motion to dismiss for lack of jurisdiction, the application for expedited discovery is denied.

**So ordered.**

  
NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Dated: May 16, 2025  
New York, New York

Respectfully submitted,

*Emery Celli Brinckerhoff Abady Ward & Maazel LLP*

Jonathan S. Abady  
Katherine Rosenfeld  
Sonya Levitova

EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP  
Page 2

*CLEAR Project, Main Street Legal Services,  
Inc.*

Naz Ahmad  
Ramzi Kassem  
Tarek Z. Ismail  
Mudassar Hayat Toppa

*Human Rights First*  
Joshua Colangelo-Bryan

*Lawyers' Committee for Civil Rights of the  
San Francisco Bay Area*  
Jordan Wells

*Law Office of Matthew Bray*  
Nathan Yaffe

Jonathan Hafetz, Esq.

*Attorneys for Plaintiff-Petitioner*

cc: All Counsel of Record (via ECF)